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Honorable James L. Robart

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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SUSAN CHEN, et al.,

NO. C16-1877 JLR

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Plaintiffs,

STIPULATED MOTION AND
[PROPOSED] ORDER TO DISMISS
INDIVIDUAL STATE DEFENDANT
TOM SOULE

11

v.

NOTE FOR HEARING: 10/15/2019

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NATALIE D'AMICO, et al.,

Defendants.

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BY STIPULATION AND AGREEMENT, the Plaintiffs and the Defendants, by and through their respective counsel of record, request the Court grant the following relief:

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1. All of Plaintiffs' claims, and Plaintiffs' Fourth Amended Complaint, as alleged against Individual State Defendant Tom Soule, in his individual and official capacities, shall be dismissed, in their entirety, with prejudice; and

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2. The dismissal requested above shall be without an award of attorneys' fees or costs to any party.

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STIPULATED MOT. &
[PROPOSED] ORDER TO
DISMISS INDIVIDUAL STATE
DEFENDANT SOULE
(C16-1877 JLR)

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ATTORNEY GENERAL OF WASHINGTON
Torts Division
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Seattle, WA 98104-3188
(206) 464-7352

SIGNED AND STIPULATED TO THIS 15th day of October, 2019.

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED THIS 23rd day of October, 2019.


JAMES L. ROBART

United States District Judge

1 **DECLARATION OF SERVICE**

2 I hereby declare that on this 15th day of October, 2019, I caused to be electronically filed
3 the foregoing document with the Clerk of the Court using the CM/ECF system, which will also
4 send notification of such filing to the following parties:

5 Aaron P. Riensche – ariensche@omwlaw.com
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9 *Court-Appointed Attorneys for Plaintiff Susan Chen, individually and as Litigation GAL
for J.L.*
10 Michael D. Myers – mmyers@myers-company.com
11 *Attorney for Plaintiff Naixiang Lian, individually and as Litigation GAL for L.L.*

12 I declare under penalty of perjury that the foregoing is true and correct.

13 s/ Scott M. Barbara
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